

RUSH MOORE LLP  
A Limited Liability Partnership

J. STEPHEN STREET 1573-0  
Pacific Guardian Center, Mauka Tower  
737 Bishop Street, Suite 2400  
Honolulu, Hawaii 96813  
Ph: (808) 521-0400  
FAX: (808) 521-0597  
e-mail: [jsstreet@rmhawaii.com](mailto:jsstreet@rmhawaii.com)

Attorney for Plaintiff PACIFIC STOCK, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

PACIFIC STOCK, INC.,	)	CIVIL NO. CV04-00725 JMS/LEK
	)	(Copyright Infringement)
Plaintiff,	)	
	)	PLAINTIFF PACIFIC STOCK,
vs.	)	INC.'S FIRST REQUEST FOR
	)	ANSWERS TO
SOLTUR, INC., a Hawaii	)	INTERROGATORIES TO
corporation; GIGI FIORENTINO,	)	DEFENDANT LUIS ZANOTTA
individually; LUIS ZANOTTA,	)	
individually,	)	
	)	<u>TRIAL:</u>
Defendants.	)	Date: February 14, 2006
	)	Time: 9:00 a.m.
	)	Judge: Hon. J. Michael Seabright
	)	

---

PLAINTIFF PACIFIC STOCK'S FIRST REQUEST FOR ANSWERS  
TO INTERROGATORIES TO DEFENDANT LUIS ZANOTTA

TO: SIDNEY MICHAEL QUINTAL, ESQ.  
1188 Bishop Street, #3402  
Honolulu, Hawaii 96813

Attorney for Defendants SOLTUR, INC.,  
GIGI FIORENTINO, and LUIS ZANOTTA

COMES NOW Plaintiff PACIFIC STOCK, INC. ("Plaintiff"), by and through its attorneys, Rush Moore, LLP, A Limited Liability Law Partnership, and pursuant to Rule 33 of the Federal Rules of Civil Procedure, requests that Defendant LUIS ZANOTTA answer the following interrogatories.

The interrogatories shall be deemed to be continuing. Information sought by the interrogatories and that are obtained after the answers are served on the undersigned must be disclosed to Defendants by supplemental answers in accordance with Rule 26(e) of the Federal Rules of Civil Procedure. Answers may be inserted in the spaces provided in the Interrogatories. If for any reason, additional space is necessary in answering any Interrogatory, answers may be completed on additional sheets bearing the same respective number as the number of the Interrogatory which is being answered.

Two (2) copies of the Answers to Interrogatories must be served on the undersigned within thirty (30) days after receipt of this request.

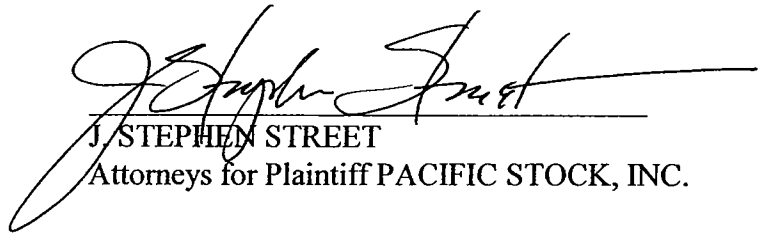
Definitions

"You" and "your" shall mean and include LUIS ZANOTTA or his agents, insurance companies, their agents, employees, its attorneys and anyone else acting on his behalf.

The term "claim" as used herein shall mean and include any claims or allegations set forth in the Complaint in this action.

Each of these definitions and instructions are hereby incorporated in each of the requests to which it pertains.

DATED: Honolulu, Hawaii, December 15, 2005.



J. STEPHEN STREET  
Attorneys for Plaintiff PACIFIC STOCK, INC.

INTERROGATORIES

1. Identify by name, address, telephone number and position, each and every employee of Soltur, Inc. from January 1997 to the present.

ANSWER:

2. State the position or positions held by you with Soltur, Inc. from January 1997 to the present, including the start and end dates for each such position.

ANSWER:

3. For each position held by you stated in answer to interrogatory number 2, state the salary or other compensation you received.

ANSWER:

4. If you were compensated by Soltur, Inc. on a commission basis at any time between January 1997 and the present, identify how such commission was calculated, and state the amount and date of each commission payment made to you.

ANSWER:

5. If you received a dividend from Soltur, Inc. at any time between January 1997 and the present, state the amount and date of each such dividend.

ANSWER:

6. Identify by name, address, telephone number and percentage interest, each and every shareholder of Soltur, Inc. from January 1997 to the present, including the dates each such interest was owned.

ANSWER:

7. Identify by name, address, telephone number and position, each and every officer and director of Soltur, Inc. from January 1997 to the present, including the dates each such position was held.

ANSWER:

8. State the name, address and telephone number of each person or entity who prepared the website for Soltur, Inc. that included use of photographs owned by Pacific Stock, as determined in the Order Granting in Part and Denying in Part Pacific Stock's Motion for Summary Judgment, filed on November 7, 2005.

ANSWER:

## VERIFICATION

STATE OF HAWAII )  
 ) ss.  
CITY AND COUNTY OF HONOLULU )

LUIS ZANOTTA, being first duly sworn upon oath, deposes and says that he has answered the foregoing interrogatories and that the foregoing answers are true to the best of his knowledge and belief.

Luis Zanotta

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Notary Public, State of Hawaii

My commission expires: \_\_\_\_\_